

# EXHIBIT F

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>In re: NATIONAL PRESCRIPTION</b>	)	<b>CASE NO. 1:17-MD-2804</b>
<b>OPIATE LITIGATION</b>	)	
	)	
<b>THIS DOCUMENT RELATES TO:</b>	)	<b>Judge Dan Aaron Polster</b>
<b><i>“Track One Cases”</i></b>	)	

**PLAINTIFFS (FIRST) COMBINED DISCOVERY REQUESTS  
TO NATIONAL RETAIL PHARMACIES DEFENDANTS**

COMES now the Track One Case Plaintiffs, by counsel, and submit the following discovery requests pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure to the National Retail Pharmacies Defendants.<sup>1</sup> Plaintiffs previously served a first set of interrogatories and request for production of documents upon the National Retail Pharmacies Defendants. Since then, the National Retail Pharmacies Defendants responded to the discovery requests in full, in part or not at all. Moreover, all of the responses complained of “vagueness” resulting in a series of meet and confers. Finally, the Special Master recently provided guidance in *Discovery Ruling* 2 on the geographical and temporal scope of discovery. As a result, this third set of discovery (but first in a combined format) is designed to synthesize and state with precision some basic elements of discovery requested by the Plaintiffs.

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<sup>1</sup> On July 1, 2018, Plaintiffs served an identical set of discovery requests on “Distributor Defendants.” To be clear, and to avoid any confusion, this discovery is directed to the “National Retail Pharmacies Defendants.” Both terms are used and defined in the complaints filed in the Case Track One cases. See Second Amended Corrected Complaint, City of Cleveland v. Purdue Pharma, LP et. al, Case No. 18-OP-45132 (N.D. Ohio), ¶95 (“Collectively, Defendants CVS, HBC, Rite Aid, Walgreens, and Walmart are referred to as ‘National Retail Pharmacies.’”); ¶96 (“Cardinal, McKesson, AmerisourceBergen, H.D. Smith, Anda, Discount Drug, Prescription Supply and the National Retail Pharmacies are collectively referred to as the ‘Distributor Defendants.’”). Plaintiffs intend for this set of discovery to now be served on all the distributors in the Case Track One cases.

**COMBINED DISCOVERY REQUESTS**

1. Please produce all ***transactional data*** related to Opioids and/or Opioid Products from January 1, 1996 to the present; please identify the Bates stamp range for each related to *Case Track One*.
2. Please produce each of your ***Suspicious Order Monitoring System (SOMS)*** policies and procedures since January 1, 2006 and identify the Bates stamp range for each; please identify the effective date(s) each was in force and effect.
3. Please identify and describe each ***suspicious order*** your Suspicious Order Monitoring System (SOMS) identified since January 1, 2006 and produce all documents related thereto; please identify the Bates stamp range for each related to *Case Track One*.
4. Please identify each suspicious order you ***reported*** to the DEA since January 1, 1996 and produce all documents related thereto; please identify the Bates stamp range for each related to *Case Track One*.
5. For each suspicious order you identified but did not report to the DEA since January 1, 2006, please describe in as much detail as possible the reasons and produce all documents related thereto; please identify the Bates stamp range for each related to *Case Track One*.
6. For each suspicious order you reported to the DEA since January 1, 2006, please identify whether you ***declined*** the order or ***shipped*** the order and produce all documents related thereto; please identify the Bates stamp range for each related to *Case Track One*.
7. For each suspicious order you reported and then shipped since January 1, 2006, please produce all documents related to your ***“due diligence”*** for each; please identify the Bates stamp range for each related to *Case Track One*.

8. Please produce and identify the Bates stamp range of all communications to and/or from the DEA since January 1, 2006, related to Opioids and/or Opioid Products (including the 2006/2007 “*Rannazzisi letters*”).

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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 3rd day of July, 2018, the foregoing has been served via email only to the following defense liaison counsel and counsel of record:

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